

Lahontan Regional Water Quality Control Board

December 19, 2014

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AFRPA Western Region Execution Center
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VIOLATION OF LAND USE CONTROLS AT SITE OT071, WHICH INCLUDES THE FORMER HOUSING AREA AT THE FORMER GEORGE AIR FORCE BASE, SAN BERNARDINO COUNTY

California Regional Water Quality Control Board (Water Board) staff recently observed fence construction field work being done at the former George Air Force Base (GAFB) by City of Victorville (City) workers. It appears there were violations of the land use controls established for the former housing area at GAFB during this project. Specific land use controls established during the transfer of the former base property to the City protect human health from known pesticide soil contamination at the housing area were not followed, resulting in an unknown risk to site workers. We request the Air Force provide additional information to ensure that the required land use controls are followed in the future, as detailed further in this letter.

Background

The former housing units were constructed starting in 1961 and used for housing military personnel until 1992. Pesticides including dieldrin were applied beneath and around the building foundations for termite control, with application of pesticide every three to five years. Dieldrin is a toxic chlorinated pesticide that is relatively persistent and immobile, and its use in the U.S. was phased out from 1974 to 1987. Dieldrin can cause adverse health effects when present at high concentrations. Dieldrin has been linked to human health problems including Parkinson's disease and breast cancer, and damage to the immune, reproductive, and nervous systems. Dieldrin tends to bioaccumulate as it is passed along in the food chain.

Soil sampling conducted between 2002 and 2006 determined dieldrin was present in site soils. The Air Force transferred the former housing area to the City in 2007 after finalizing the Findings of Suitability to Transfer (FOST) document. Land use restrictions were established during the transfer and documented in the associated quitclaim deed.

The deed included the agreement that the new land owner (the Southern California Logistics Airport Authority of the City)...

"will not conduct, or allow others to conduct, any soil disturbing activities (e.g., construction, digging, excavating, drilling, grading, removing, trenching, filling, moving, farming/planting, or mining) without a Health and Safety Plan."

The author of the health and safety plan must have the appropriate training to develop appropriate protective measures (e.g., personal protective equipment) and training requirements (e.g., hazardous waste operation or HAZWOPER training) for site workers.

In your letter to the City dated February 4, 2005 (Enclosure 4), the Air Force described the site conditions as follows:

"The Air Force has analytical testing data indicating elevated soil contamination levels of the pesticides Aldrin and Dieldrin in the housing area. The Air Force believes that the surface and shallow subsurface soil contamination is pervasive through the housing area, particularly under house foundations. The pesticides could present a risk to human health if soils are inhaled, ingested, or contacted by skin. Any wastes generated by digging must be handled as hazardous until proven otherwise."

Recent Field Observations

Water Board staff conducted a site visit on October 7, 2014. Access to the former housing area was not controlled by fencing and no warning signs appeared to be present. Moreover, the former housing area is accessible to the general public. A work crew was observed drilling fence posts along the east side of Nevada Avenue at the edge of the former housing area. The 2-man crew was using a Bobcat-mounted auger to drill holes into the soil along the street and removing soil from the augers by hand without gloves or any other visible personal protective equipment (Enclosure 2). Water Board staff asked the work crew if they had a health and safety plan. The crew was not able to provide a health and safety plan, but did provide their paperwork from Harris Steel Fence Co., Inc. from San Pedro. The paperwork showed a City of Victorville contact name and number: Mr. Rick Falzone at 760-686-0253. Water Board staff called that contact and requested a copy of the health and safety plan for the fence post drilling. Several work days later, Mr. Eric Ray from the City of Victorville and the Southern California Logistics Airport sent an email that indicated "This project was completed without a Health and Safety Plan as it was deemed unnecessary" (Enclosure 3). The letter went on to state the reasons why a health and safety plan was not considered necessary; however, it did not include information on how the restrictions in the deed were complied with. Recent soil sampling between the housing area and Nevada Avenue has not been conducted to determine whether dieldrin is present in the area of the fence post drilling. The concentrations remaining in the shallow soil at the former housing area site were documented in 2006, when concentrations well above health-based screening levels were found.

Also observed during the October 7, 2014, site visit was a paint ball recreation area and stockpiled soils with building debris. Paint ball games are not addressed directly in the deed, but may lead to human exposure to dieldrin contained in soil through inhalation of dust, dermal contact, or incidental ingestion. The soil piles may be from the housing demolition noted by Mr. Mook in the 2005 letter or may be from post-transfer soil disturbances that would require a health and safety plan according to the deed.

The violation in land use controls observed at the former housing area is significant beyond the specific fence post drilling incident. Land use controls are being selected by the Air Force as a key element of final remedies for other sites located at the former George AFB and other bases. It is imperative that the Air Force demonstrate that approved land use controls are reliably implemented, even after properties are transferred. The ability of regulatory agencies to approve of land use controls as an integral component of final remedies will be limited if land use controls prove ineffective after properties are transferred.

Concern Regarding Schools

Another concern related to dieldrin soil contamination is the presence of schools located adjacent to the former housing area; namely, the former George AFB Elementary School and George Junior High (Middle) School. These schools were apparently built during the same time period as the housing units and similar construction procedures may have been followed, including the possible application of pesticides for termite control. These schools were transferred to the Adelanto Unified School District in 1994. The former elementary school is now operated as an adult educational facility called Taylion High Desert Academy. The former middle school is now leased by Adelanto Unified School District to Excelsior Charter School (grades 7-12). Apparently, the soils at these schools have not been tested for dieldrin.

Information Needed

The Water Board hereby requests the following information from the Air Force to control current and future risks to human health and the environment from the known presence of dieldrin in soil at Site OT071, which includes the former housing unit.

1. Summarize the current process being followed to ensure the City implements the land use controls required in the deed for Site OT071. The Water Board requests this summary by February 2, 2015.
2. Provide a report to explain how all the existing land use restrictions at the former air force base are being implemented and their effectiveness. This report should include a thorough evaluation of land uses, including past, present, and likely future land uses. The Water Board requests this land use control report by March 9, 2015.
3. Describe the measures that will be taken by the Air Force to address the violation of the land use controls by the City. Please include all steps the Air Force intends to take to address the violation and prevent future land use control violations. The Water Board requests this description by February 2, 2015.
4. Summarize whatever soil characterization data has been collected at the two schools located near the former housing area, provide any associated evaluation of human health risk, and clarify when the schools were built. The Water Board requests this information by February 2, 2015.

If you have any questions regarding this letter, you may contact Todd Battey at (760) 241-7340, Todd.Battey@waterboards.ca.gov, or me at (760) 241-7325
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Enclosures: 1) Quitclaim Deed
2) Photograph of drilling along Nevada Avenue
3) Email dated November 4, 2014, from Eric Ray (City of Victorville) to Todd Battey (Water Board)
4) Letter dated February 4, 2005, from Phil Mook to Jon Roberts

cc: Dan Medina, USAF, AFCEC/CZRW, Western Region Branch Chief
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